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August 21, 2001

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Magalie R. Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

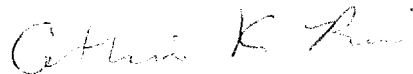
Re: CC Docket Nos. 00-218, 00-249, 00-251

Dear Ms. Salas:

Enclosed for filing in this proceeding are an original and three (3) copies of Verizon Virginia Inc.'s Objections to AT&T and WorldCom's Ninth Set of Data Requests and of Verizon Virginia Inc.'s Objections to AT&T's Tenth Set of Data Requests. Although AT&T and WorldCom agreed with Verizon that all cost-related discovery and discovery on non-mediation issues (other than discovery related to rebuttal) would be served by August 10, Verizon nevertheless will respond to these late requests, subject to the enclosed objections. A copy of this letter and the objections is being served on AT&T and WorldCom by electronic mail and by hand delivery or overnight mail.

Thank you for your consideration in this matter.

Sincerely yours,



Catherine Kane Ronis

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11-02-2001 04:30

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**AUG 21 2001**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
Petition of WorldCom, Inc. Pursuant	)	
to Section 252(e)(5) of the	)	
Communications Act for Expedited	)	
Preemption of the Jurisdiction of the	)	CC Docket No. 00-218
Virginia State Corporation Commission	)	
Regarding Interconnection Disputes	)	
with Verizon Virginia Inc., and for	)	
Expedited Arbitration	)	
	)	
In the Matter of	)	
Petition of Cox Virginia Telecom, Inc.	)	
Pursuant to Section 252(e)(5) of the	)	
Communications Act for Preemption	)	CC Docket No. 00-249
of the Jurisdiction of the Virginia State	)	
Corporation Commission Regarding	)	
Interconnection Disputes with Verizon	)	
Virginia Inc. and for Arbitration	)	
	)	
In the Matter of	)	
Petition of AT&T Communications of	)	
Virginia Inc., Pursuant to Section 252(e)(5)	)	CC Docket No. 00-251
of the Communications Act for Preemption	)	
of the Jurisdiction of the Virginia	)	
Corporation Commission Regarding	)	
Interconnection Disputes With Verizon	)	
Virginia Inc.	)	

**VERIZON VIRGINIA INC.'S OBJECTIONS  
TO AT&T'S TENTH SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox, and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the Tenth Set of Data Requests served on Verizon by AT&T on August 17, 2001.

## **GENERAL OBJECTIONS**

1. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek confidential business information covered by the Protective Order that was adopted and released on June 6, 2001. Such information will be designated and produced in accordance with the terms of the Protective Order.

2. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek attorney work product or information protected by the attorney-client privilege.

3. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 et seq.

4. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are overly broad, unduly burdensome or vague.

5. Verizon objects to AT&T's Data Requests because the cumulative burden of responding to these seven requests (at least 22, counting the multiple subparts) and more than 600 prior requests (many with subparts) unfairly and excessively interferes with Verizon's ability to prepare its case. The timing of these requests impairs Verizon's ability to prepare its case because the same Verizon personnel whose expertise is necessary for responding to these requests are currently preparing Verizon's rebuttal testimony.

6. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information from independent corporate affiliates of Verizon Virginia Inc., or from board members, officers or employees of those independent corporate affiliates, that are not parties to this proceeding.

7. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Virginia Inc. territory. According to the Arbitrator's letter of August 3, 2001, parties seeking information about Verizon's operations in other states must establish that "such information is relevant to the specific disputes over contract language presented in this proceeding."

8. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia.

9. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to AT&T, WorldCom or any other entity.

10. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are redundant of prior data requests served by AT&T.

The General Objections identified above shall apply to each and every Data Request below.

## DATA REQUESTS

1. In the Verizon Direct testimony of Margaret Detch, Susan Fox, Steve Gabrielli, Nancy Gilligan, Richard Rousey, and Alice Shocket related to Unbundled Network Elements (“Detch *et al.* UNE Direct Testimony”), Verizon states: “Notwithstanding the current legal standard, Verizon VA will provide new combinations of UNE-Platform at new and existing locations where facilities are available and currently combined, even though retail service has not been activated over those facilities, provided that no new construction is required to do so and the CLEC pays any non-recurring charges associated with activating the facilities.” (page 4, lines 8-12)

Please explain the meaning of term “currently combined” in the previous quotation and identify all “non-recurring charges associated with activating the facilities” referenced therein. Please identify the relevant section of Verizon’s proposed interconnection agreement and/or tariff where such charges are listed.

2. On page 5 of the Detch *et al.* UNE Direct Testimony, Verizon states “If Verizon later decides to offers EELs throughout density zone 1, it will then implement the local switching exemption.”

Given that this exception is not a change of law, what contract language has Verizon proposed to cover a situation in which Verizon may elect to offer EELs in the future? In such cases, would CLECs retain the option to forego use of the EELs and continue to have access to the unrestricted ULS for the duration of the interconnection agreement?

3. On page 19 of Verizon’s Direct Testimony of Rosemarie Clayton *et al.* related to Advanced Services, Verizon states: “[L]oop make-ups can change during the normal course of engineering the network.”

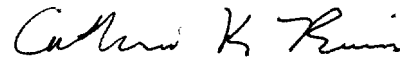
- a. Please identify all the types of loop make-up changes that may be included in this statement, how frequently such changes occur in the course of a year in Verizon VA and the reasons for making such changes. Specifically, how frequently does each of the following occur:
  - i. continuous copper loop plant of 15Kft or less is placed upon a digital loop carrier system
  - ii. load coils are added to loop plant that is 15Kft or less in length.
  - iii. bridge taps are added to a customer loop that is currently and continuously being used for service.

- b. If a carrier pre-qualified a loop as DSL capable, how would Verizon identify that the loop is being used for DSL service and may not have its copper feeder re-arranged to DLC-based feeder? To the extent that such a designation exists, how (if at all) is it modified when the retail customer disconnects the DSL service but continues to receive voice service using the loop's lower frequency?
- 4. On page 38 of the Direct Testimony of Rosemarie Clayton *et al.* related to Advanced Services, Verizon states "Verizon VA has not installed these NGDLC systems with the electronics that support the ATM packet functionality, no[r] has it installed any OCDs or packet switches with which these systems would communicate."
  - a. Has Verizon made a corporate decision that NGDLC equipment such as Alcatel's Litespan-2000 is approved for deployment within the Verizon footprint, at least with respect to former Bell Atlantic territories?
    - i. If so, has any recommendation been made that Verizon deploy new Alcatel Litespan-2000 equipment and/or upgrade existing Alcatel Litespan-2000 equipment (including but not limited to generic upgrades, dual fed fiber transport, and/or improved power and heat dissipation capabilities) to support DSL deployment in anticipation of regulatory waivers for Verizon to own and deploy electronics that can be used to provide advanced services, including but not limited to OCDs and ADLU cards?
    - ii. If any such recommendation was made, when was the initial recommendation made, what was the essence of the recommended action, and what assumptions were specified with regard to DSL penetration?
    - iii. If the initial recommendation was subsequently modified, updated or otherwise revised, when were such changes made and how did they modify the initial recommendation?
  - b. Has Verizon made any estimates of how long it typically takes to deploy the OCD or packet functionality employed to provide DSL capabilities using the Litespan-2000 architecture? If so, what is the estimated interval, and what factors most influence any variance to this estimate?
  - c. Where Verizon has deployed an Alcatel 2000 DLC that is equipped only to support voice services, what modification to the equipment in the remote terminal (RT) would be required in order to support ATM-based transport between the RT and the Central Office?

- i. Is it Verizon's standard practice within any portion of its operating territory in VA to deploy fiber fed DLC in any circumstance? If so, please describe each such circumstance.
  - ii. Is it Verizon's recommended practice to deploy new DLCs and upgrade existing DLCs in a manner that accommodates dual fiber fed feeder to the RT?
  - iii. If the appropriate version of software (e.g., 10.2.X) controls an Alcatel Litespan 2000 installation and fiber strands exist to the RT, is there any physical work required at the RT to establish ATM transport to the Central Office other than the insertion of a control unit (e.g., the ATM Bank Controller Unit or ABCU) into the channel bank present in the RT? If Verizon asserts that additional power and ventilation augments are required in such cases, why are such augments required?
    - (a) How long does it take to insert an ABCU at a typical RT containing the basic Alcatel 2000 DLC infrastructure, and what factors most influence any variance to this estimate?
    - (b) Is the TDM-based transport for the RT affected by the insertion of the ABCU (or equivalent)? If so, what is the nature of the impact and is it service affecting?
  - d. What physical modifications to the Alcatel Litespan 2000 infrastructure would be required for Verizon to support fiber loops to or close to retail customer premises (commonly referred to as fiber-to-the curb)? Does Verizon currently recommend that Alcatel Litespan 2000 should or may be used to provide fiber-based loops to customers in locations where the fiber extends into what is currently referred to as distribution facilities?
5. Does Verizon any reason to believe that RT based ADSL is fundamentally incompatible with CO-based ADSL when the two loops are in the same binder group? If so, please state the basis for such belief.
6. How many binder groups typically subtend an RT? If information regarding the number of binder groups can be disaggregated by common RT sizes, please provide such a disaggregation.
7. Please provide a copy, or alternatively identify the location in the record, of the contract provisions proposed by Verizon VA to implement the proposal described at pages 11-13 of the Direct Testimony of Donald E. Albert and Peter J. D'Amico as Verizon VA's Virtual Geographically Relevant Interconnection Point ("VGRIP").



Respectfully submitted,

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Dated: August 21, 2001

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Attorneys for Verizon

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T's Tenth Set of Data Requests were served electronically and by either hand delivery or overnight mail this 21st day of August, 2001, to:

Dorothy Attwood (not served electronically)  
Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554\*

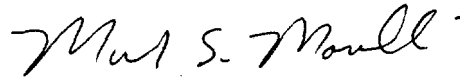
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Mark S. Morelli

\* Served by hand delivery.